atlas pipeline
operating affiliates

May 14, 2007

Ms. Linda Daugherty
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration
233 Peachtree Street
Suite 600
Atlanta, GA 30303

RE: Notice of Amendment. (**CPF-2-2007-1008M**)

Ms. Daugherty;
This letter is in response to the Notice of Amendment dated April 18, 2007. There were 14 items addressed in the letter, we have included documentation for each item in the letter. Ozark Gas Transmission respectfully submits the following:

1. **§ 191.5 Telephonic notice of certain incidents.**
**(b) Each notice required by paragraph (a) of this section shall be made by telephone to 800-424-8802 (in Washington, DC, 267-2675) and shall include the following information.**

**Ozark's procedures did not include the 800 telephone number for reporting incidents.**

At the time of the inspection the 1-800-424-8802 was hand-written in the O&M manual, The MOC (Management of Change) was in process to permanently include the number in the OGT operations and maintenance manual. This information was shared with the inspector during the inspection. The Management of Change was adopted in January 2007, with O&M manual revised accordingly.

2. **§ 191.25 Filing safety-related condition reports.**
**(a) Each report of a safety-related condition under § 191.23(a) must be filed (received by the Associate Administrator, OPS) in writing within five working days (not including Saturday, Sunday, or Federal Holidays) after the day a representative of the operator first determines that the condition exists, but not later than 10 working days after the day a representative of the operator discovers** the condition. **Separate conditions may be described in a single report if they are closely related. Reports may be transmitted by facsimile at (202) 366-7128.**

**Ozark's procedures did not specify to whom this report would be filed.**

At the time of the inspection the (202) 366-7128 was hand-written in the O&M manual. The MOC (Management of Change) was in process to permanently include the number in the OGT operations and maintenance manual, this information was shared with the inspector during the inspection. The Management of Change was adopted in January 2007, and the O&M manual has been revised accordingly.

3. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
**(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
**(8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found.**

**Ozark's procedures do not adequately address this regulation.**

During the inspection the inspector provided OGT with his assessment of the procedure in place at the time of the inspection, OGT subsequently considered his assessment and guidance and the procedure has been revised accordingly through the companies Management of Change process. The procedure for this section is located in O&M Section 304 – Continuing Surveillance & Patrolling; Periodic Review of Records. O &M Section 304, pg 2 of 2.

4. **§192.614 Damage prevention program.**
**(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:**
**(6) Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:**
**(ii) In the case of blasting, any inspection must include leakage surveys.**

**0zark's procedures do not require leak surveys following blasting.**

At the time of the inspection the inspector provided his assessment of the procedure in place at the time. The company has reviewed and revised the procedure using the Management of Change process. The procedure for this section is located in O&M Section 1400 – Damage Prevention pg 2 of 5 "General" section, (5) and further address' the this requirement in "Procedures C. (5) pg 4 of 5.

5. **§192.615 Emergency plans.**
**(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At *a* minimum, the procedures must provide for the following:**
**(6) Emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property.**
**(7) Making safe any actual or potential hazard to life or property.**
**(8) Notifying appropriate fire, police, and other public officials of gas**

**pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.**

**Ozark's procedures do not adequately address regulation sections (a) (6) and (a) (7).**

This procedure has been reviewed and revised by the company for this item is located in O&M Section 1602 – Emergency Notification Procedures.

**Ozark procedures addressing regulation section (a) (8) did not specify notification to the NRC or the 800 number.**

As stated in the company's response to item 1, At the time of the inspection the 1-800-424-8802 was hand-written in the O&M manual, an MOC (Management of Change) was in process to permanently include the number in the OGT operations and maintenance manual, this information was shared with the inspector during the inspection. The Management of Change was adopted January 2007, the manual was revised accordingly.

6. **§192.619 What is the maximum allowable operating pressure for steel or plastic pipelines?**
**(a) Except as provided in paragraph (c) of this section, no person may operate a segment of steel or plastic pipeline at a pressure that exceeds the lowest of the following:**
**(1) The design pressure of the weakest element in the segment, determined in accordance with Subparts C and D of this part. However, for steel pipe in pipelines being converted under §192.14 or uprated under subpart K of this part, if any variable necessary to determine the design pressure under the design formula (§192.105) is unknown, one of the following pressures is to be used as design pressure:**
**(1) Eighty percent of the first test pressure that produces yield under section N5 of Appendix N of ASME 831.8 (incorporated by reference, ( see § 192.7), reduced by the appropriate factor in paragraph (a)(2)(ii) of this section; or**
**(ii) If the pipe is 12% inches (324 mm) or less in outside diameter and is not tested to yield under this paragraph, 200 p.s.i. (1379 kPa) gage.**
**(2) The pressure obtained by dividing the pressure to which the segment was tested after construction as follows:**
**(i) For plastic pipe in all locations, the test pressure is divided by a factor of 1.5.**
**(ii) For steel pipe operated at 100 p.s.i. (689 kPa) gage or more, the test pressure is divided by a factor determined in accordance with the following table:**

| Class location | Factors[1], segment | | |
|---|---|---|---|
| | Installed before (Nov. 12, 1970) | Installed after (Nov. 11, 1970) | Covered under §192.14 |
| 1 | 1.1 | 1.1 | 1.25 |
| 2 | 1.25 | 1.25 | 1.25 |
| 3 | 1.4 | 1.5 | 1.5 |
| 4 | 1.4 | 1.5 | 1.5 |


| Class location | Factors[1], segment | | |
|---|---|---|---|
| | Installed before (Nov. 12, 1970) | Installed after (Nov. 11, 1970) | Covered under §192.14 |
| 1 | 1.1 | 1.1 | 1.25 |
| 2 | 1.25 | 1.25 | 1.25 |
| 3 | 1.4 | 1.5 | 1.5 |
| 4 | 1.4 | 1.5 | 1.5 |

| Pipeline segment | Pressure date | Test date |
|---|---|---|
| --Onshore gathering line that first became subject to this part (other than § 192.612) after April 13, 2006. | March 15, 2006, or date line becomes subject to this part, whichever is later. | 5 years preceding applicable date in second column. |
| - - Onshore transmission line that was a gathering line not subject to this part before March 15, 2006. | | |
| Offshore gathering lines. | July 1, 1976. | July 1, 1971. |
| All other pipelines. | July 1, 1970. | July 1, 1965. |

**(4) The pressure determined by the operator to be the maximum safe pressure after considering the history of the segment, particularly known corrosion and the actual operating pressure.**

**(b) No person may operate a segment to which paragraph (a)(4) of this section is applicable, unless overpressure protective devices are installed on the segment in a manner that will prevent the maximum allowable operating pressure from being exceeded, in accordance with §192.195.**

**(c) The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with §192.611.**

**Ozark's procedures do not adequately address this regulation.**

During the inspection the inspector expressed his assessment of company procedure, it was conveyed there was a Management of Change in process the revise the procedure in the company manual at the time of the inspection. Subsequently, OGT has processed the MOC and adopted the revised procedure. The procedure(s) for this item are located in O&M Section 309 – Establishing MAOP for Pipelines and Company IMP manual 6-012, 6-013 & 6-014.

7. **§192.703 General.**

**(b) Each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service.**

**Ozark's procedures do not adequately address this regulation.**

OGT reviewed the inspector's assessment of the procedure and provided additional language to the operations and maintenance manual through the companies Management of Change process. The procedures for this item are located in O&M Section 1200 – Leak, Imperfection, Damage, & Repair of Transmission Lines, including (Table 1 pg 5 & 6 of 6).

8 **§192.705 Transmission lines: Patrolling.**

**(d) The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in the following table:**

| Class location of line | Maximum interval Between Patrols | |
|---|---|---|
| | At highway and railroad crossings | At all other places |
| 1, 2 | 7 1/2 months; but at least twice each calendar year. | 15 months; but at least once each calendar year. |
| 3 | 4 1/2 months; but at least four times each calendar year. | 7 1/2 months; but at least twice each calendar year. |
| 4 | 4 ½ months; but at least four times each calendar year. | 4 1/2 months; but at least four times each calendar ear. |

**Ozark's procedural manual did not cover this regulation.**

Respectfully, Ozark feels the procedure was adequately addressed in the company operations and maintenance manual at the time of the inspection. The inspector did not recognize or locate the procedure during the inspection. The procedure for this item is located in O&M Section 302 – Continuing Surveillance & Patrolling; Patrols.

9. **§192.706 Transmission lines: Leakage surveys.**
**(a) In Class 3 locations, at intervals not exceeding 7 ½ months, but at least twice each calendar year; and**
**(b) In Class 4 locations, at intervals not exceeding 4'/2 months, but at least four times each calendar year.**

**Ozark's procedures do not adequately address this regulation.**

Respectfully, Ozark believes the procedure was adequately addressed in the company operations and maintenance manual at the time of the inspection, this apparently have not been recognized or identified. The procedure has been modified through the company Management of Change process in 04-07 to include additional language and documentation. The procedures for this section are located in O&M Section 303 – Continuing Surveillance & Patrolling; Leakage Surveys.

10. **§192.709 Transmission lines: Record keeping.**
**Each operator shall maintain the following records for transmission lines for the periods specified:**
**(a) The date, location, and description of each repair made to pipe (including pipe-to-pipe connections) must be retained for as long as the pipe remains in service.**
**(b) The date, location, and description of each repair made to parts of the pipeline system other than pipe must be retained for at least 5 years. However, repairs generated by patrols, surveys, inspections, or tests required by subparts L and M of this part must be retained in accordance with paragraph (c) of this section.**
**(c) A record of each patrol, survey, inspection, and test required by subparts L and NI of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.**
**Ozark's procedures do not adequately address this regulation.**

During the inspection this section of the code was addressed in the Appendix of the company operations and maintenance manual. The inspector's assessment and comments were the code section should addressed in the body of the operations and maintenance manual, his comments were reviewed and the procedure was revised and language was added through the companies Management of Change process to O&M Section 304 – Continuing Surveillance & Patrolling; Periodic Review of Records.

11. **§192.745 Valve maintenance: Transmission lines.**
**(b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.**

**Ozark's procedures do not adequately address this regulation.**

This procedure has been reviewed and revised through the company's Management of Change process. The procedures for this item are located in O&M Section 1100 – Valve Maintenance – pg 1 of 3.

**12. §192.225 Welding procedures.**

**(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (incorporated by reference, see § 192.7) or section IX of the ASME Boiler and Pressure Vessel Code — Welding and Brazing Qualifications" (incorporated by reference, see § 192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures shall be determined by destructive testing in accordance with the applicable welding standard(s).**

**Ozark's procedures addressing this regulation did not include the specific edition of the technical specifications API 1104 and or ASME Boiler and Pressure Vessel Code.**

The company has addressed this item in a Management of Change to include the 19th Edition for API 1104 and 2001 for section IX. The procedures are located in Section 800 of the company's operations and maintenance manual.

**13. §192.227 Qualification of welders.**

**(a) Except as provided in paragraph (b) of this section, each welder must be qualified in accordance with section 6 of API 1104 (incorporated by reference, see § 192.7) or section IX of the ASME Boiler and Pressure Vessel Code (incorporated by reference, see § (192.7) . However, a welder qualified under an earlier edition than listed in appendix A of this part may weld but may not requalify under that earlier edition.**

**Ozark's procedures addressing this regulation did not include the specific edition of the technical specifications API 1104 and or ASME Boiler and Pressure Vessel Code.**

As referenced above the company has addressed this item in a Management of Change to include the 19th Edition for API 1104 and 2001 for section IX. The procedures are located in section 800 of the company's operations and maintenance manual.

**14. §192.485 Remedial measures: Transmission lines.**

**(a) General corrosion. Each segment of transmission line with general corrosion and with a remaining wall thickness less than that required for the MAOP of the pipeline must be replaced or the operating pressure reduced commensurate with the strength of the pipe based on actual remaining wall thickness. However, corroded pipe may be repaired by a method that reliable engineering tests and analyses**

**show can permanently restore the serviceability of the pipe. Corrosion pitting so closely grouped as to affect the overall strength of the pipe is considered general corrosion for the purpose of this paragraph.**

**(b) Localized corrosion pitting. Each segment of transmission line pipe with localized corrosion pitting to a degree where leakage might result must be replaced or repaired, or the operating pressure must be reduced commensurate with the strength of the pipe, based on the actual remaining wall thickness in the pits.**

**Ozark's procedures addressing this regulation did not have remedial measures for localized and general corrosion.**

The procedure has been reviewed and updated through the companies Management of Change process. The procedures for this item are located in O&M Section 1200 – Leak, Imperfection, Damage, & Repair of Transmission Lines. Page 3 &4 of 6.

If any questions arise or any additional information is needed, please call (918) 496-4903.

Respectfully,

Thomas B. Williams

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Senior Vice-President – Engineering & Operations
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Cc. Mr. Rod Seeley - Director, Southwest Region, PHMSA

Enclosure: Response to Notice of Amendment – CPF-2-2007-1008M